

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

V.

NO: 1:15-cr-00102-LM

MICHAEL BOUGIE

ASSENTED TO MOTION TO CONTINUE

NOW COMES the Defendant, Michael Bougie, by and through counsel, and hereby moves this Court to continue his January 28, 2016 Final Pre-Trial and his February 2, 2016 Trial for an additional 60 days.

In support of this Motion, the defendant states as follows:

1. The Defendant is scheduled to appear in this Court for his Final pre-Trial on January 28, 2016 and is scheduled for his Trial on February 2, 2016;
2. However, both Parties are still negotiating a potential resolution for the case and need additional time to finalize negotiations;
3. In addition the undersigned counsel will be out of the country on vacation January 23, 2016 through January 28, 2016;
4. Additionally, on February 2, 2016 the undersigned counsel is scheduled for a Compliance and Election Hearing, Commonwealth v. M. Giza, which has been going on for approximately a year and a half, in Lawrence District Court at 9:00 a.m. The undersigned counsel is also scheduled for Probable Cause Hearing, State v. J. Brand, in Seabrook District Court at 1:00 p.m. on February 2, 2016;
5. That the Prosecutor, Assistant US Attorney Jennifer Davis, has been contacted and assents to this Motion to Continue.

WHEREFORE, the Defendant, Michael Bougie, respectfully requests that this Court grant this Motion to Continue and continue his Final Pre-Trial and his Trial for an additional 60 days.

Respectfully submitted
Michael Bougie,
By his Attorney,

Date: January 21, 2016

/s/ Paul J. Garrity
Paul J. Garrity
Bar No. 905
14 Londonderry Road
Londonderry, NH 03053
603-434-4106

CERTIFICATE OF SERVICE

I, Paul J. Garrity, herein certify that on this 21st day of January, 2015, a copy of the within Assented Motion to Continue was e-filed for Assistant US Attorney Jennifer Davis.

/s/ Paul J. Garrity
Paul J. Garrity